

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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T.E., *et al.*,

Plaintiffs,

v.

No. 12-CV-2303 (KMK) (PED)

PINE BUSH CENTRAL SCHOOL DISTRICT, *et al.*,

Defendants.  
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**DEFENDANTS' PROPOSED VOIR DIRE QUESTIONS**

Defendants PINE BUSH CENTRAL SCHOOL DISTRICT, PINE BUSH CENTRAL SCHOOL DISTRICT BOARD OF EDUCATION, PHILIP G. STEINBERG, ERIC WINTER, STEVEN FISCH, and ROBERT PETERS, by their attorneys, propose the following *voir dire* while empaneling the jury in this action:

1. Where do you live?
2. What is your age?
3. What is your educational background, including subjects majored in or studied?
4. What legal background, if any, do you have?
5. What is your occupation and employment background?
6. Are you married?
7. What is your spouse's occupation?
8. What are the ages and occupations, if applicable, of your children.
9. Where have your children attended school?
10. Do you live or have you ever lived within the Pine Bush Central School District?

11. Do you have a close friend or family member who attends or works for the Pine Bush Central School District?
12. If so, who, and where in the District?
13. Do you believe you have knowledge of the facts involved in this case, other than what you learned in Court today?
14. If so, how did you learn such facts?
15. Have you, or any close friends or family members been employed within a school district in any way, including as a member of a School Board?
16. If so, who, what position, and where?
17. How often do you attend school board meetings?
18. Have you or any members of your family served as elected officials of a school district, including a member of a Board of Education?
19. Do you know anyone who currently has any children who attend the Pine Bush Central School District?
20. Do you know anyone who is employed by the Pine Bush Central School District?
21. Have you ever had occasion to complain about certain actions by a school district? If so, what were the circumstances?
22. Have you ever brought any claims or lawsuits against a school district for any reason? If so, please provide details?
23. Have you or a family member ever been the victim of bullying or peer harassment at any time?
  - a. 23. If so, when? What were the circumstances?
24. How did you handle it?

25. Have you ever felt demeaned based on your race, religion or gender?
26. If so, when and what were the circumstances?
27. Have you ever raised a harassment or discrimination claim of any nature on your own behalf or on behalf of a family member?
28. If so when, and what were the circumstances?
29. Have you ever served on a jury that entered a verdict? What type of case?
30. What was the verdict?
31. Did you vote with the majority or minority?
32. Did you serve as a foreman on that jury?
33. Have you ever been a plaintiff or a defendant to a lawsuit?
34. If so, were you plaintiff or the defendant being sued?
35. What was the nature of the case?
36. Were you satisfied by the outcome?
37. Have you ever testified in Court or at a deposition?
38. Do you have opinions regarding civil rights cases?
39. Are you a member of any social, business, religious, professional or educational organization?
40. Are you acquainted with any of the witnesses, lawyers, or parties to this case, or know their spouses, parents or children?
41. Do you know any present or former employees or elected officials of the pine Bush Central School District?
42. If so, who? What is the nature of that relationship?

43. Do you have any preconceived notion or knowledge about the Pine Bush Central School District, based on what you have learned or been aware of at this point?
44. Have you read anything about this case?
45. Have you or any of your family members been disciplined by a school district? If so, please provide details.
46. Have you or a family member ever been accused of harassment or discrimination? If so, what were the circumstances?
47. Is there any reason you prefer not to sit on this jury?
48. Is there any reason you believe you could not be fair and impartial in this case?
49. Is there anything about what you heard, or your experiences and background which you think will interfere with your ability to render a fair and impartial verdict?

DATED: May 29, 2015

Respectfully submitted,

/s/ Joan Gilbride

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